

Claims that Network Optimization Program is Necessary for USPS Survival



service standards and repositioning itself as a provider of second- or third-tier shipping services, the Postal Service should painstakingly exhaust all alternative means of “bring[ing] operating costs in line with revenues”—including means that are calculated to augment rather than further diminish the Postal Service’s revenue streams.

The Postal Service is expected to review all comments filed, and to issue a Notice of Proposed Rulemaking in early December. At that point, interested parties, including the NPMHU, will be allowed to file additional comments and reactions.

As for the proposed studies of 252 mail processing facilities, the Postal Service intends to follow a similar schedule. Sometime in December, the Postal Service will be submitting a request for an advisory opinion from the Postal Regulatory Commission (PRC), as it is required to do under the governing statutes, much like the prior submissions the USPS made on five-day delivery and the closing of more than 3,000 retail postal outlets. The PRC then will issue a procedural schedule – lasting approximately 90 days – that will allow interested parties, again including the NPMHU, to file discovery requests and cross-examine USPS witnesses and evidence, all in an effort to show that the proposed restructuring of the mail processing and transportation network is an ill-conceived scheme.

Meanwhile, the National Office of the NPMHU is beginning to work with the Local Unions to conduct opposition research about many of the particular closings or consolidations that have been proposed. A careful analysis of the 252 facilities has revealed some interesting facts:

Approximately 100 of the facilities listed are relatively small, and have no mail handlers currently working at them. This includes many customer service facilities and smaller “processing” facilities.

Several of the facilities listed for further study are annexes or other smaller parts of larger installations, meaning that the potential closing

or consolidation may result in the abolishment of jobs and the posting of bids in the main building, rather than excessing outside of the current installation.

In several cases, the same installation is going to be studied as a potential losing and a potential gaining installation, so the process for stakeholder and public involvement could have a profound impact on where and when jobs are lost or gained.

Several of the facilities listed for study could not rationally be considered for closing, and thus may be included on the list of possible

The Postal Service’s Proposal is ill-conceived and should unceremoniously be laid to rest.

sites for “political” or “bargaining” purposes, providing the Postal Service with the ability to appease postal stakeholders or politicians who complain the loudest, and providing the Postal Service with the ammunition to argue, if the USPS is eventually challenged, that its process of study and public input actually works because it resulted in the cancellation of several proposed closings or consolidations.

One thing is very clear. The NPMHU will have to remain vigilant for the next several months as the Postal Service attempts to implement its Network Optimization Program. The National Office will take advantage of the governing legal proceedings, and will assist the Local Unions in contesting many of the proposed closings and consolidations. Several years ago, when dealing with prior USPS plans to close or consolidate facilities, the National Office adopted a comprehensive approach to dealing with

potential shifts in the mail processing network. In summary, that approach has been described as follows:

It was agreed during the NPMHU’s early strategy meetings that not every notice of a consolidation or closing is going to require the same response—every situation is different. In some cases – such as where the proposal concerns a facility that currently has no mail handlers, or where the mail handlers in that facility do not object to the consolidation – the Local Union may decide not to get involved. In other cases, the best approach may be to “wait and see.” In every case, however, communication between and among the National Office, the relevant Regional Office, and the affected Local Union(s) and Branch(es) is critical. Of even more importance, it is crucial to communicate with the affected or potentially affected members. The key is to make a determination about what is the appropriate response in a particular situation, and to assist the relevant Local Union and the membership in deciding how to respond and what to do once that determination has been made.

Finally, for any closings or consolidations that may be implemented after the studies are complete, the NPMHU will assist the Local Unions to minimize the dislocation and inconvenience to affected mail handlers. Acting through the National Joint Task Force on Article 12, and acting in accordance with the Memorandum of Understanding on Workforce Repositioning, the NPMHU is committed to ensuring that current mail handlers are protected in their current jobs, at their current locations, to the maximum extent possible.

Additional information will be circulated, as soon as it is available. In the meantime, if you want to determine if your installation may be affected by the studies proposed as part of the Network Optimization Program, you can see a list of the impacted facilities on the NPMHU website at the link to “Critical Postal Issues.”